

### Remarks

Claims 1-29 are pending in this application. In an Office Action dated February 23, 2005, the Examiner rejected claims 1-12 under the “judicially created doctrine of doctrine of double patenting.” These claims are being considered in this case through a blunder by the Patent Office and will be canceled prior to issuance. The Examiner rejected claims 1-5 and 7-11 under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,345,498 to Mauger (Mauger). The Examiner rejected claims 13, 15-17, 19-24, 26, 28 and 29 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,134,341 to Dougherty *et al.* (Dougherty). The Examiner objected to claims 6, 12, 14, 18, 25 and 27 without comment. The Examiner also objected to the specification without indicating where in the specification the text in question was located. Applicants disagree with the Examiner’s rejections and request reconsideration in light of the following remarks.

Claim 1 provides a method for connecting a wireless handset to a wireline switch in an integrated wireline/wireless telecommunications network having a plurality of access controllers and wireline switches, each of the access controllers being coupled to at least one of the wireline switches. An identification of a subscriber is received in response to a call attempt. A preferred connection between the wireless handset and one of the plurality of wireline switches is determined based on predetermined data associated with the subscriber. The wireless handset is connected to one of the plurality of wireline switches based on the preferred connection so as to complete the call attempt.

The Examiner asserts that claim 1 is anticipated by Mauger. However, Mauger determines which wireline switch to use based on location of the wireless handset, not on “predetermined data associated with the subscriber.” For example, with regard to Mauger’s Figure 3, when the wireline system first receives a wireless call, it assumes the call is a zonal call and routes the call through the wireline main switching unit (MSU 22). The wireless mobile switching center (MSC 21) determines, based on the location of the mobile handset, whether the call is local, zonal or interzonal. If local, the call is completed through a local exchange switch (LE 20). If zonal, the call is completed through the MSU. If interzonal, the call is completed through a remote MSU (25). The PCN identification pointed to by the Examiner is used by the MSC to find the PCN location from a location register, not to

determine which switch will make the connection. The passage disclosing this operation is at column 3, lines 30-58, reproduced as follows (emphasis added):

When the PSTN LE 20 receives a call for mobile subscriber 01X YYYY ZZZZ from a PSTN subscriber, **it initially translates 01X as being a PCN zonal call** with a zonal network tariff and identifies an MSC junction. **A number 7 signalling message (IAM 01X YYYY ZZZZ) (PCN number message) is then sent to the nearest MSC 21 via the PSTN main switching unit (MSU) 22. The MSC 21 determines from the location registers whether the called mobile is local, zonal or interzonal.** If the call is a zonal call MSC 21 will be that **identified and the call proceeds using the zonal tariff i.e. is terminated.** However if the call is a local call, then the MSC 21 translates the message to give a DDI code comprising part of the PCN number (DDI Code YYZZZZ), identifying a PCN local tariff and a respective BSC junction (23), and **that is sent back (drop back) as a drop back message to the to the local exchange LE 20**, which translates and routes it as a CCITT Q 931 or national variant e.g. DASS 2, or a CCITT No 7 NUP, message to the identified BSC 23 and the call proceeds using the PCN local tariff. Alternatively, **if the call is an interzonal call** then the MSC 21 translates the message to give a national number group PCN routing code, 011 nnYYZZZZ with a PCN interzonal tariff and a remote MSC junction (24) and **this is dropped back as a drop back message to the LE 20 and thence sent to the identified remote MSC 24 via MSU 22 and remote MSU 25 as a IAM (011nnYYZZZZ) message and thence to the appropriate mobile.**

Thus, the choice of a wireline switch is based not on predetermined data associated with the subscriber, as provided in claim 1, but on the location of the subscriber. Mauger neither teaches nor fairly suggests Applicants' invention of determining a preferred connection between a wireless handset and one of a plurality of wireline switches based on predetermined data associated with the subscriber.

Claim 1 is patentable over Mauger. Claims 2-6, which depend from claim 1, are therefore also patentable.

Independent claim 2 further provides that each access controller includes a plurality of physical ports for terminating connections between the access controller and associated wireline switches. Determining the preferred connection includes determining a

preferred wireline switch from the plurality of wireline switches and a connection port from the plurality of physical ports based on the predetermined data. The Examiner made no attempt to find any such teaching in Mauger. In fact, Mauger makes no mention of ports.

Dependent claim 3 further provides that determining the preferred wireline switch includes receiving the identification of the subscriber from one of the wireline switches in response to a call delivery attempt to the wireless handset and determining a home wireline switch associated with the wireless handset from the plurality of wireline switches based on the predetermined data. The Examiner made no attempt to find any such teaching in Mauger.

Dependent claim 4 further provides that determining the preferred wireline switch includes receiving the identification of the subscriber from one of the access controllers in response to a call origination attempt by the wireless handset and determining at least one wireline switch from a subset of the plurality of wireline switches based on predetermined communications traffic data, the subset corresponding to the wireline switches actually coupled to the one of the access controllers. The Examiner made no attempt to find any such teaching in Mauger.

Dependent claim 5 further provides that determining the connection port includes determining a plurality of preferred ports from the plurality of physical ports based on the predetermined data, the plurality of preferred ports being a subset of the plurality of physical ports and having common line-side features associated therewith. The Examiner made no attempt to find any such teaching in Mauger.

Independent claim 7 provides a system for connecting a wireless handset to a wireline switch in an integrated wireline/wireless telecommunications network having a plurality of access controllers and wireline switches, each of the access controllers being coupled to at least one of the wireline switches. The system includes a wireless service processor receiving identification of a subscriber in response to a call attempt and determining a preferred connection between the wireless handset and one of the plurality of wireline switches based on predetermined data associated with the subscriber. An access controller connects the wireless handset to one of the plurality of wireline switches based on the preferred connection so as to complete the call attempt.

The Examiner rejected claim 7 without identifying any specific teaching in Mauger for Applicants' wireless service processor and access controller. Rather, the Examiner relied entirely on the argument provided for claim 1. While Applicants believe claims 1 and 7 have different scopes, the reasons used to show that claim 1 is patentable over Mauger apply as well to claim 7. Claim 1 is patentable over Mauger. Claims 8-12, which depend from claim 7, are therefore also patentable.

Dependent claim 8 further provides that each of the access controllers includes a plurality of physical ports for terminating connections between the access controller and associated wireline switches. The wireless service processor, in determining the preferred connection, determines a preferred wireline switch from the plurality of wireline switches and a connection port from the plurality of physical ports based on the predetermined data. The Examiner made no attempt to find any such teaching in Mauger.

Dependent claim 9 further provides that the wireless service processor, in determining the preferred wireline switch, receives the identification of the subscriber from one of the wireline switches in response to a call delivery attempt to the wireless handset and determines a home wireline switch associated with the wireless handset from the plurality of wireline switches based on the predetermined data. The Examiner made no attempt to find any such teaching in Mauger.

Dependent claim 10 further provides that the wireless service processor, in determining the preferred wireline switch, receives the identification of the subscriber from one of the access controllers in response to a call origination attempt by the wireless handset and determines at least one wireline switch from a subset of the plurality of wireline switches based on predetermined communications traffic data. The subset corresponding to the wireline switches is actually coupled to the one of the access controllers. The Examiner made no attempt to find any such teaching in Mauger.

Dependent claim 11 further provides that the wireless service processor, in determining the connection port, determines a plurality of preferred ports from the plurality of physical ports based on the predetermined data. The preferred ports comprising a subset of the physical ports with common line-side features associated therewith. The Examiner made no attempt to find any such teaching in Mauger.

Independent claim 13 provides a system for connecting a subscriber wireless handset to one of a plurality of wireline switches in an integrated wireline/wireless telecommunications network. The system includes a wireless service location register identifying the subscriber with one of the wireline switches and identifying the subscriber with a feature group representing features subscribed to by the subscriber. At least one access controller, in communication with the wireless handset and with at least one wireline switch, switches a call between the handset and one wireline switch based on the handset subscriber feature group. An access manager, in communication with the wireless service location register and each access controller, selects an idle port on the access controller switching the call.

The Examiner rejected claim 13 as anticipated by Dougherty. As described by the Examiner, Dougherty neither teaches nor fairly suggests at least Applicants' wireless access controller.

Applicants' wireless access controller switches a call between the wireless handset and a wireline switch based on the handset subscriber feature group. The Examiner's entire rejection of this element is "see fig. 1, elements 16, 20, 24, 28, col. 3, lines 20-60 and its description." The elements cited by the Examiner in Dougherty's Figure 1 make up virtually the entire system disclosed by Dougherty. Thus, the Examiner has not identified, with any specificity, what he believes Dougherty discloses as Applicants' wireless access controller.

The only element disclosed in Dougherty which appears to come close to Applicants' wireless access controller is the mobile switching system 24 shown in Dougherty's Figure 1. The operation of Dougherty's mobile switching system is disclosed at column 3, line 66-column 4, line 10, as follows:

In operation, when mobile switching system 24 receives a call from the wireline network which is directed to a wireless unit 28, mobile switching system 24 deciphers the telephone number and alerts appropriate Base Station Controllers (not shown) to page the corresponding wireless unit 28. Similarly, when wireless unit 28 places a call, mobile switching system 24 accepts the dialing data from the BSC and dials the desired number for transmission to wireline network 12. Mobile switching system 24 also processes mobile registration status

data received from a BSC, switches calls to other cells, processes diagnostic information, and compiles mobile billing statistics.

Nowhere does this discussion teach or fairly suggest that the mobile switching system is “operative to switch a call between the handset and one wireline switch based on the handset subscriber feature group” as provided in claim 13. In fact, there is no mention of feature groups whatsoever.

Since Dougherty neither teaches nor fairly suggests Applicants’ wireless access controller, claim 13 is patentable over Dougherty. Claims 14-18, which depend from claim 13, are therefore also patentable.

Dependent claim 15 further provides that the wireless service location register receives the identification of the subscriber from one of the wireline switches in response to a call delivery attempt to the wireless handset and determines a home wireline switch associated with the wireless handset from the plurality of wireline switches. The Examiner made no attempt to find any such teaching in Dougherty.

Dependent claim 16 further provides that the wireless service location register receives the identification of the subscriber from an access controllers in response to a call origination attempt by the wireless handset and determines at least one wireline switch from a subset of the wireline switches corresponding to the wireline switches coupled to the access controller. The Examiner made no attempt to find any such teaching in Dougherty.

Dependent claim 17 further provides that the access manager determines at least one preferred port as a subset of ports supporting common line-side features. The Examiner made no attempt to indicate any teaching in Dougherty for a subset of ports or for common line-side features.

Independent claim 19 provides a method for connecting a subscriber wireless handset to one of a plurality of wireline switches. A subscriber identification is received in response to a call attempt. The subscriber is associated with one of a plurality of feature groups subscribed to by the subscriber based on the subscriber identification. One of the switches is determined based on the subscriber identification. The call is connected between the handset and one of the wireline switches based on the associated subscriber feature group.



The Examiner rejected claim 19 as anticipated by Dougherty. In particular, the Examiner's entire argument that Applicants' step of "connecting the call between the handset and one of the wireline switches based on the associated subscriber feature group" is disclosed in Dougherty is "see fig. 1, elements 28, 24, 26, 16 and its description." Nowhere does Dougherty teach or fairly suggest basing a call connection on a feature group associated with a wireless subscriber.

Claim 19 is patentable over Dougherty. Claims 20-25, which depend from claim 19, are therefore also patentable.

Independent claim 26 provides a method for connecting a subscriber wireless handset to one of a plurality of wireline switches in an integrated wireline/wireless telecommunications network. The subscriber is identified with one of the wireline switches in a wireless service location register. The subscriber is also identified with a feature group representing features subscribed to by the subscriber in the wireless service location register. A call is switched between the handset and the identified wireline switch in an access controller based on the identified subscriber feature group.

The Examiner provided no argument as to why claim 26 was anticipated by Dougherty. Dougherty neither teaches nor fairly suggests switching a call between a handset and a wireline switch based on a subscriber feature group identified with a wireless subscriber. Claim 26 is patentable over Dougherty. Claims 27-29, which depend from claim 26, are therefore also patentable.

Claims 1-29 are pending in this application. Applicants believe these claims meet all substantive requirements for patentability over the prior art. Applicants will cancel claims 1-12 once these claims are indicated as allowable over the prior art.


A check in the amount of \$120 is enclosed to cover the Petition fee. Please charge any additional fees or credit any overpayments as a result of the filing of this paper to our Deposit Account No. 02-3978.

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The Examiner is invited to contact the undersigned to discuss any aspect of this case.

Respectfully submitted,  
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